

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Donald Jacob Burrs, Jr.
a/k/a Donald Jacob Burrs

Debtor 1

Joyce Melinda Burrs

Debtor 2

Specialized Loan Servicing, LLC

Movant(s)

v.

Donald Jacob Burrs, Jr.
a/k/a Donald Jacob Burrs
Joyce Melinda Burrs

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:22-BK-02516-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 51

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Donald Jacob Burrs, Jr. and Joyce Melinda Burrs, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Paragraph 2 contains a conclusion of law to which no response is required.
3. Upon information and belief, the averments as stated in Paragraph 3 are admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.
5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.
6. Upon information and belief, the averments as stated in Paragraph 6 are admitted.
7. Upon information and belief, the averments as stated in Paragraph 7 are admitted.
8. Admitted in part. Upon information and belief, the averments regarding the executed promissory note are admitted. Debtor(s) are without sufficient knowledge as to Movant(s)' actions if the original promissory note is lost or destroyed.
9. Admitted.

10. Upon information and belief, the averments as stated in Paragraph 10 are admitted. By way of further response, Debtor(s) are ready to bring their account current per stipulation terms agreeable to the parties.

11. Upon information belief, the averment as stated in Paragraph 11 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

12. Upon information and belief, the averments as stated in Paragraph 12 are admitted.

13. Admitted.

14. Admitted.

15. Paragraph 15 contains a conclusion of law to which no response is required.

16. Admitted.

17. Paragraph 17 contains a conclusion of law to which no response is required.

18. Paragraph 18 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: June 27, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, June 27, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

Michelle McGowan, Esquire
Robertson, Anschutz, Schneid, Crane & Partners, PLLC
13010 Morris Road, Suite 450
Alpharetta, GA 30004
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo US Courthouse
1501 North Sixth Street, 3rd Floor
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire